

DOCKET FILE COPY ORIGINAL

RECEIVED

Before the  
FEDERAL COMMUNICATIONS COMMISSION  
Washington, D.C. 20554

MAR 29 1993

FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF THE SECRETARY

In the Matter of

New Service Reporting

)  
)  
)

CC Docket No. 92-275

inclusion of the service price cap indexes.<sup>3</sup> Thus, three annual reports would be required for new services. Given the changes the Commission has made regarding support requirements for price-cap LEC's new service filings, BellSouth believes the Commission should entirely eliminate the new services report for price-cap LECs. The new services report was intended as a means for the Commission to evaluate carrier forecasts and the accuracy of net revenue estimates that accompanied new service filings. The Commission, however, has revised its price cap rules to eliminate the net revenue test for price-cap LECs. In its place it has imposed more extensive data requirements for price-cap LEC's new service filings. In light of these changes new services reports are no longer necessary for price-cap LECs.

If the Commission declines to eliminate the new services report for price cap LECs, then, BellSouth supports the Commission's tentative conclusions. As the Commission correctly concludes in its Notice, yearly reporting requirements for new services would be an equally effective method for the Commissions' purposes. Yearly reports, as opposed to quarterly reports, would continue to allow the Commission to monitor carrier's forecasts. In addition, the Commission would maintain its ability to assess whether

---

<sup>3</sup> Notice at para. 5.

carriers are being innovative in their provision of services and if their new services satisfy customers needs.

BellSouth agrees that yearly reports would be less of a burden on both the Commission and carriers and would result in a savings to both in terms of time and resources. More importantly, BellSouth also believes annual reporting would be more logical since no forecast upon which a new service may be based is prepared on a quarterly basis.

BellSouth believes the Commission should further clarify the duration of the reporting requirement. Certainly, no more than three annual reports should be required. For price cap LECs; one annual report should be sufficient.

Respectfully submitted,

BELLSOUTH TELECOMMUNICATIONS, INC.

By:   
William B. Barfield  
Richard M. Sbaratta

Its Attorneys

Suite 1800  
1155 Peachtree Street, NE  
Atlanta, Georgia 30367-6000  
(404) 249-2661

Date: March 29, 1993